

March 31, 2003

Ms. Rebecca Kane
US EPA
Office of Enforcement and Compliance Assurance
MC 2222A
1200 Pennsylvania Avenue NW
Washington DC 20460

Subject: **ECHO project – comments**

Dear Ms. Kane:

Constellation Generation Group (CGG), a wholly owned subsidiary of Constellation Energy Group (CEG) is pleased to provide the following comments on the November 20, 2002 Notice regarding the Agency's Enforcement and Compliance History Online (ECHO) web site. Our comments are limited in scope to the facilities that are owned and or operated by CGG:

(A) ACCURACY OF DATA

- The data included in the ECHO are largely outdated. Specifically, the facility names are inconsistent throughout each distinct facility's listing. Different facility names appear under different permitting programs.
- The designated ownership(s) of several facilities in the ECHO system are inconsistent with our current corporate structure. We suspect that these discrepancies may be a result of the state's inability to update the permitting and compliance database(s) that is their responsibility. We would recommend that if this ECHO web site's information is going to be useful, that the appropriate level of resources should be made available to the states to update and maintain their databases that in turn are delivered to EPA for inclusion in the ECHO system.
- The RCRA ID Number for one facility dates from the original notification of hazardous waste activity filed in 1980 (MDT000621243). This EPA ID number has since been superseded (MDD000621243); however, the continued existence of the 23-year-old number is troubling.

(D) CHANGING ON-LINE DATA

- There seems to be little ability to affect change and make corrections to the data via an online mode. We have attempted to modify the data that is on the ECHO site and have been directed to go back to the state to make those corrections. While we fully intend to explore this option, we believe that the "owner" of the facility should be able to make appropriately verifiable corrective changes in the ECHO databases.

SECURITY CONCERNS

- We support the comments of the Edison Electric Institute, regarding security concerns involving the ECHO database's information. CGG owns and operates numerous fossil, nuclear, hydroelectric, wind, and geothermal electric generating facilities that are located throughout the United States. We urge the Agency to carefully balance the need for public disclosure of environmental compliance information and other facility-related information, with the other potentially strategic facility-related information that may be available through the ECHO website.

If you have any questions regarding these comments, please contact me at 410-793-3506.

Yours very truly,



Lawrence H. Liden
CGG Environmental Services

Cc: H. L. Dye, Jr – MDE Hazardous Waste Program
J. Hovey/E. Tracey/P. Stover-Catha -- CGG Environmental Services Dept
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D. Geneva - Calvert Cliffs Nuclear Power Plant
J. Petro - CEG Legal